

## ATTACHMENT 1

### COMPLAINT FORM

(for filers who are prisoners without lawyers)

IN THE UNITED STATES DISTRICT COURT

FOR THE Western DISTRICT OF Wisconsin  
Robert W. Hastenmeir U.S. Court House, 120 W. Henry St, Room 320

(Full name of plaintiff(s))

Timothy Randolph

22-cv-732-wmc

vs

Case Number:

(Full name of defendant(s))

Wellpath Corporate

20-cv-694-bbc  
(to be supplied by clerk of court)

#### A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at  
(State)

P.O. Box 189 Phoenix, MD 21131  
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant well path CORPORATE  
(Name)

is (if a person or private corporation) a citizen of Tennessee  
(State, if known)

and (if a person) resides at 1283 Murfreesboro Road Nashville, TN, 37217  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for DANE county Jail, 115 W Doty St. MADISON WI, 53703  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

The plaintiff Timothy Randolph is a Inmate at DANE  
County Jail in Madison Wisconsin. At about dinner time  
on July. 01, 2020. Deputy COYNE told Mr. Randolph  
to lock down. which he refused. Mr. Randolph was then  
moved to segregation. Mr. Randolph was also moved again to  
623. This time Sergeant Schroeder was available. He told deputy  
COYNE and other deputies "why is Mr. Randolph head moving. They  
than forced Mr. Randolph to a steel door so hard they  
popped his elbow out of plane. Mr. Randolph

WAS placed in a restraining chair while in  
Excruciating pain for two hours. Mr. Randolph  
than asked for a nurse or doctor to check  
out his ARM. His injury WAS ignored and  
NONE treated for three weeks. This ALL happened  
BECAUSE Sergeant Schroeder didn't like Mr.  
Randolph due to previous incidents in the  
PAST. And due to nurses and staff NOT  
EXAMining Mr. Randolph's ARM, IT now HAS  
NERVE problems and isn't healing correctly.  
Deputy Coyne and other deputies even made  
fun about the situation by continuously ask  
Mr. Randolph "How is that ARM doing" MR.  
Randolph is SEEKING DAMAGES for nurses  
and staff ignoring him and Refusing him  
medical attention for three weeks, while  
in serious pain the whole time.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

Mr. Randolph would like to seek a million dollars in damages for all the excruciating pain and suffering he has and is currently going through. Mr. Randolph would also like for medical staff and Dane County deputies, to start to treat the inmates in Dan County Jail better and also seek more medical attention when needed. Mr Randolph would also like for DANE county to hire new nurses who are more careful and respectful to the inmates. And not ignore inmates when they need medical help.

E. JURY DEMAND

☐ Jury Demand - I want a jury to hear my case  
OR

☒ Court Trial - I want a judge to hear my case

Dated this 24 day of December 20 22.

Respectfully Submitted,

Timothy Randolph  
Signature of Plaintiff

692 727  
Plaintiff's Prisoner ID Number

P.O Box phoenix, MD 21131  
Dodge Correctional Institution  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.